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Letter by Fax 2 pages
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29th May 2001

Ms. Donna Wieting, Chief
Marine Mammal Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3226

Dear Ms. Wieting,

SURVEILLANCE TOWED ARRAY SENSOR SYSTEM (SURTASS) LOW FREQUENCY ACTIVE (LFA) SONAR PROGRAM (PAF 01-197)

Thank you for extending the deadline for public comment to you on the above subject. Since reading the British science journal, Geographical in February and Sunday Telegraph news report 29.04.01 and tracking the chain of bulletins from The Whale and Dolphin Conservation Society plus Internet newscasts I appeal to you in the following way. I am deeply concerned about the U.S Navy's plan along with NATO to flood hundreds of thousands of square miles of our oceans with injuriously loud, and harmful low frequency noise, and about the U.S National Marine Fisheries Service's proposal to permit it.

'Whales in peril from submarine defence system' is only the tip of the iceberg. This system poses a potentially devastating threat to marine mammals including endangered species - and questions about other Ocean life needs to be asked. Such as effect on fish and their breeding and growth cycle and the knock on threats to the world fisheries as deployment of this active sonar system would include 80% of the World's Oceans being zapped! The risk to health for families on holiday by the seashore whilst bathing or scuba diving must also raise serious questions following known cases published. Leisure tourism and travel trades would have more than a passing interest in current developments not to mention the voters. Many Scientist, Oceanographers, Biologists have expressed their alarm at the data now being released and publish their own appeals to stop this type of sound technology now. 'Bad Vibrations' is a very apt way Geographical described it.

Thanks to American legislature on freedom of information, many respected scientists, conservation organisations plus thousands of concerned citizens from many countries around the globe can express their grave worries and ask you not to authorize a new five year permit to authorize the Navy to injure and kill cetaceans and irreparably damage other Ocean life in the furtherance of these trials.

The data the Navy has amassed on potential effects of LFAS on cetaceans is judged to be severely deficient. To this add dolphins, porpoises, and sea turtles, here the Navy's data on estimated sea turtle kills and fish by LFAS transmission is virtually non-existent, seals, sea otters and other marine animals are in peril. LFAS was tested at low levels on only four species of whales for about one month each, consequently we know virtually nothing about what impact the higher deployment level sonar will have on marine life and humans over the long term. Nor has it adequately examined the connection between active sonar and mass stranding of whales.

The U.S Navy has attempted to dismiss the relevance of the stranding of beaked whales in Greece during NATO LFAS exercises in 1996. Faced with a research report's conclusion that there was a less than one percent probability that the cause of the stranding could have been anything other than LFAS, the Navy has attacked the methodology of the researcher who studied the incident. The Navy attempted to affirm that the timing of the LFAS transmissions and the unprecedented stranding event could have been a coincidence. The Navy is evidently unaware of the precautionary principle, sufficient grounds to deny the applicant a 'small take' permit by your department, the National Marine Fisheries Service.

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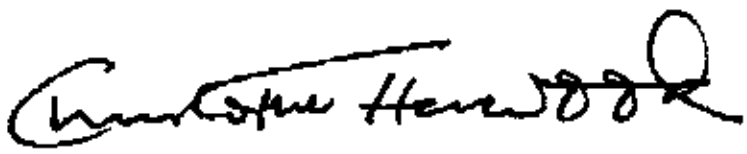
All alarm bells really begin to ring on the point that that the Navy has asserted that the LFAS testing program was not designed to evaluate "worst-case scenarios" and thereby justifies its extrapolation from harassment effects at RL 140 dB to effects at RL 180 dB. However, the Navy's definition of "employment" of the system does not include the actual use of the system for the purpose for which it was created. Outside of war games, at any time of declared "heightened threat conditions" the Navy will claim exemption from environmental laws for reasons of national security and all proposed mitigation's will be abandoned, meaning LFAS is likely to be operated in near-shore areas, at full 240 dB source levels, and whether or not cetaceans are sighted within 1 km of the deployment vessel. As the Navy intends to exempt itself from NEPA whenever it deems it necessary – inevitably creating thereby the "worst-case scenario" for which they admit they have not conducted tests -- all the more reason for the Navy to seriously pursue an alternative that has not already proven to generate high levels of harassment at low levels of deployment, as has LFAS.

The Navy's research has focused on LFAS damaging hearing in cetaceans. This is not the main problem. Evidence now indicates that the damage from high intensity sonar is due to resonance phenomena in the whales' cranial air spaces that tear apart delicate tissues around their brains and ears causing hemorrhaging and leads to a painful death. Necropsies show that this is what caused the death of the whales in the Bahamas stranding in March 2000. The Navy has known about the resonance phenomena issue since 1998.

On June 27, 2000 Rear Admirals Fages and Davis ,U.S Navy spoke before a subcommittee of the House Armed Services Committee saying the Navy now has two new passive listening systems. SURTASS Twin Line and Advanced Deployable System (ADS) – that can detect quiet submarines at considerable distances where previously they were thought to be undetectable. These passive systems will not harm marine life and appear to be a safe alternative to LFAS. The use of safe, passive listening systems was not addressed in the EIS (Environmental Impact Survey). By using the safe, passive detection systems and shutting down LFAS, the Navy can fulfill its mission for national security and be stewards of the seas. Passive submarine detection systems developed since the introduction of the 1980s-era technology on which LFAS is based, also include TB-29 towed array with Acoustic Rapid Insertion Sonar (ARCI). These passive sonar provide safe and viable alternatives to SURTASS LFA. So why risk the lives of marine mammals when these safe alternatives exist?

I ask you to withdraw your proposed rule and to deny the Navy's application to deploy LFA sonar.

Yours Sincerely,



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